

IN BoS 502

Continuum of Care and Emergency Solutions Grant

Board Approved policy for Continuum of Care and Emergency Solutions Grant Rapid Rehousing Programs

Board Approved: 11/29/2018

Effective: 01/01/2019

Rapid Rehousing Written Standards

Rapid Rehousing (RRH) is permanent housing as defined by HUD, RRH is community based housing with a designated length of stay; however, the CoC regulations (24 CFR 578) and ESG regulations (24 CFR 576) limit rental assistance payments to no more than twenty-four (24) months. The RRH program participant must be the tenant on a lease for a term of twelve (12) months that is renewable and is terminable only for cause.

Participant Eligibility:

- CoC participants must meet HUD's Category 1, 2 **or** 4 definition of homeless for CoC Rapid Rehousing. ESG participants are required to meet HUD's Category 1 or 1 (literally homeless) **and** 4 (fleeing domestic violence).
- ESG participants must have household income of less than or equal to 30% Area Median Income (AMI). This does not apply for the initial intake, but is enforced when income is reassessed during interim-evaluations. The 30% AMI threshold does not apply to CoC participants during any eligibility period.
- Have a completed VI-SPDAT during current episode of homelessness
- Recipients and sub-recipients must conduct interim-evaluations, at least every 6 months of program participants receiving RRH assistance.
- Households with no income at initial evaluation and/or re-evaluation are eligible.
- As indicated by HUD, households who are eligible for permanent supportive housing (PSH) and awaiting PSH placement MAY receive RRH assistance and will retain their homeless and, if applicable, chronically homeless status. Clients who are awaiting PSH placement must have disability documentation.
- The CoC Program Notice of Funding Availability (NOFA) may impose additional eligibility requirements not reflected in the regulation. Projects funded to carry out RRH assistance under the CoC program must follow both CoC Program NOFA and regulatory requirements.

Participant Prioritization:

- Clients with lower VI SPDAT scores (6-8 range) should mostly receive RRH. However, no clients should be excluded from this rental assistance should it be available. *Regions in the CoC may write a policy for prioritization based on the needs within their region.*

RRH Program Standards:

- Permanent housing is the immediate goal. The individual or family is provided with rapid access to permanent housing with minimal preconditions that could serve as barriers. For example: good credit or good rental history cannot be required screening criteria.
- IN BoS RRH recipients and sub-recipients must use a progressive engagement model; this practice supports using the least intense intervention to help resolve homelessness for the individual or family. Providers are to add more assistance only as necessary if the less-intense intervention is unsuccessful.
- Participants can receive short-term rental assistance for up to 3 months, or medium term rental assistance lasting from 4-12 months. In some cases clients may receive rental assistance up to 24 months. Clients who also have a documented disability and are waiting a PSH unit can receive rental assistance for more than 12 months and up to 24 months. Under limited circumstances clients that could benefit from rental assistance from 12-24 months may be considered on a case by case basis providing this keeps them from homelessness and will help them be self-sufficient at the end of the rental assistance.
- All rental assistance must be tenant based.
- Participants in RRH are eligible to receive supportive services alone or in combination of eligible supportive services and rental assistance.
 - a. CoC participants are eligible for a wide range of services outline in 24 CFR 278.53 and supportive services may be provided until 6 months after rental assistance stops.
 - b. ESG participants are eligible for supportive services limited to housing relocation and stabilization services. Housing stability case management assistance may not exceed 30 days during the period in which the program participant is seeking permanent housing and may not exceed 24 months during the period in which the program participant is living in permanent housing.
- In addition to receiving tenant based rental assistance, RRH participants may also receive the following additional financial assistance
 - a. CoC participants are eligible for:
 - Security deposits (not to exceed the amount of 2 months of rent)
 - First and last month's rent
 - Property damage
 - Total property damage payments during a single enrollment in the RRH program may not exceed an amount equal to one month of the participant household's rent. This is paid to the property owner on behalf of the program participant.
 - Damages are only eligible to be paid if the security deposit collected did not exceed one month initially or was a fixed amount that did not exceed one month of rent.
 - b. ESG participants are eligible for:
 - Rental application fees
 - Security deposits (not to exceed the amount of 2 months of rent)
 - Last month's rent
 - Utility deposits and payments (up to 24 months, including up to 6 months for payments in arrears)

- Moving costs
- Limitations on amount, frequency and duration of assistance:
 - a. Rapid rehousing recipients and sub-recipients must require the program participant to meet with a case manager not less than once per month to assist the program participant in maintain long-term housing stability.
 - b. Participants must be re-evaluated at least every 6 months to determine the need for continued assistance. This requirement applies to both supportive services and rental assistance. Through each re-evaluation, the recipient or sub-recipient must determine that the continuation of assistance is necessary to avoid literal homelessness.
 - c. Progressive engagement must be implemented for households who have a VI-SPDAT score between 6 and 8, who are not participating in rapid-rehousing while awaiting PSH placement. The following percentage increase should apply to the participant's rent contribution:
 - Months 1-6: participant's rent contribution will be at minimum 30% of their monthly adjusted income.
 - Months 6-12: participant's rent contribution increases by 40% from months 1-6, or income will be recalculated and the participant will be required to pay 30% of their monthly adjusted income, whichever amount is higher.

Progressive Engagement Examples				
Example 1: No change in income				
	Monthly Adjusted Income	Gross Monthly Rent	Client Rent Contribution	Rental Assistance Subsidy
Months 1-6	\$1,030.00	\$600.00	\$309.00	\$291.00
Months 6-12	\$1,030.00	\$600.00	\$432.60	\$167.40
Example 2: Increase in monthly adjusted income				
	Monthly Adjusted Income	Gross Monthly Rent	Client Rent Contribution	Rental Assistance Subsidy
Months 1-6	\$1,030.00	\$600.00	\$309.00	\$291.00
Months 6-12	\$1,500.00	\$600.00	\$432.60	\$167.40
(40% increase of previous contribution)				
	\$1,500.00	\$600.00	\$450.00	\$150.00
(30% of recalculated monthly adjusted income)				

- d. If upon re-assessment it is determined that a higher amount of assistance than the limited specified above or a longer duration of assistance is necessary to avoid literal homelessness, then the provider should not terminate assistance and place the household into homelessness.
 - e. Participants may be eligible for rapid-rehousing assistance for multiple episodes of literal homelessness based on their need. To ensure the efficient use of resources, recipients and sub-recipients may establish a maximum amount or number of times that a program participant may receive rapid rehousing assistance.
- No unit may be assisted with rental assistance until the unit has been inspected and the unit meets HUD's Housing Quality Standards (HQS). Applicable lead based paint requirements apply.
 - Rental assistance will only be provided for a unit if the rent is reasonable. Recipients and sub-recipients must determine whether the rent charged for unit receiving rental assistance is reasonable related to rents charged for comparable unassisted units through GoSection8. The rent paid must not exceed that which is determined to be reasonable.

- a. For ESG RRH, rental assistance may only cover up to the FMR for a unit, in addition to the rent being reasonable.
- b. For CoC RRH, rental assistance can exceed the FMR for a unit, as long as the rent is reasonable.